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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No.: CR 06-330 SI
Plaintiff,) PARTIES' STIPULATION AND
v.) PROPOSED ORDER EXCLUDING
BRIAN WOODSON,) TIME UNDER SPEEDY TRIAL ACT
Defendant.)

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties last appeared before this Court on July 28, 2006 for status. At the request of the defendant, a settlement conference was scheduled with the Honorable Joseph C. Spero.

2. The defendant requested an exclusion of time because of the ancillary proceedings to be held before Magistrate Judge Spero and effective preparation of counsel.

3. The parties move that the time period from July 28, 2006 through September 26, 2006, the next calendared date before Magistrate Spero, be excluded from the calculation of time under the Speedy Trial Act due to effective preparation of counsel and the pending ancillary proceedings.

4. In light of the foregoing facts, the failure to grant the requested exclusion would unreasonably deny counsel for the defense the reasonable time necessary for effective

1 preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A),
2 (B)(iv). The ends of justice would be served by the Court excluding the proposed time period.
3 These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. §
4 3161(h)(8)(A).
7/28/06 to 9/26/06

5 5. For the reasons stated, the time period from ~~July 7, 2006 through July 21, 2006~~, shall be
6 excluded from the calculation of time under the Speedy Trial Act.

7 SO STIPULATED.

8 DATED: 9/22/06

Respectfully Submitted,

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DATED: 9/22/06

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16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED:

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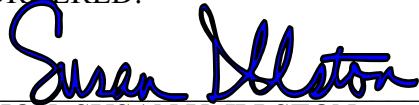
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/s/
SUSAN REED JERICHE
Assistant United States Attorney

/s/
GEOFFREY HANSEN
Counsel for Defendant


HON. SUSAN Y. ILLSTON
Judge, United States District Court

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Parties' Stipulation and Proposed Order in the case of United States v. Brian Woodson No. CR 06-330 SI, was served today as follows:

Hand Delivery
Geoffrey Hansen, Esq.
Federal Public Defender's Office

I certify under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2006 at San Francisco, California

/s/
Rawaty Yim
United States Attorney's Office